

UNITED STATES DISTRICT COURT – EASTERN DISTRICT OF NEW YORK

YONG KAI ZHANG v. WAI REALTY CORP., ET AL – 18-cv-3189 (FB) (ST)

DAMAGE CALCULATIONS FOR PLAINTIFF YONG KAI ZHANG

(Relevant Period: May 31, 2012 to July 31, 2016)

(217 weeks)

HOURS WORKED: 8:30 AM – 6:30 PM x 6 days = 60 hours/week

<u>Assumptions:</u>	HOURS WORKED WEEKLY:	60
	OT HOURS WORKED WEEKLY:	20
	TOTAL WEEKS WORKED:	217
	TOTAL OT HOURS WORKED:	4,340 (20 x 217)

Weekly Salary: **\$420.00** (\$70.00 / day x 6 days)

Hourly Rate: **\$10.50** / hour (\$420.00 / 40)

NYC Min. Wage: \$7.25 per hour (2012-2013)
\$8.00 per hour (2014)
\$8.75 per hour (2015)
\$9.00 per hour (2016)

Overtime Rate: **\$15.75** / hour

Unpaid Minimum Wages: **NO UNPAID MINIMUM WAGE**

Unpaid Overtime Wages: **\$68,355.00** (\$15.75 x 20 hours x 217 weeks)

TOTAL UNPAID WAGES (MW + OT): **\$68,355.00**

LIQUIDATED DAMAGES: **\$68,355.00**

PENALTY – NYLL §195(1): **\$5,000.00**

PENALTY – NYLL §195(3): **\$5,000.00**

COSTS: **\$415.00**

LEGAL FEES: **TBD**

INTEREST (9%): **TBD**

TOTAL DEMAND: **\$147,125.00**

(Excluding Legal Fees and Interest)

UNITED STATES DISTRICT COURT – EASTERN DISTRICT OF NEW YORK

YONG KAI ZHANG v. WAI REALTY CORP., ET AL – 18-CV-3189 (FB) (ST)

DAMAGE CALCULATIONS FOR PLAINTIFF HAI CHEN LI

(Relevant Period: January 10, 2015 to August 30, 2015)

(33 Weeks + 2 days)

HOURS WORKED: 8:30 AM – 9:00 PM x 6 days = 75 hours/week [Off on Sundays]

<u>Assumptions:</u>	HOURS WORKED WEEKLY:	75
	OT HOURS WORKED WEEKLY:	35
	TOTAL WEEKS WORKED:	33
	TOTAL OT HOURS WORKED:	1,155 (35 x 33)
	<u>Weekly Salary:</u>	\$461.54 (\$2,000/mo. x 12 / 52) – See FLSA
	<u>Hourly Rate:</u>	\$11.54/hour (\$461.54 / 40) – See NYLL/FLSA
	<u>NYC Min. Wage:</u>	\$7.25 per hour (2012-2013) \$8.00 per hour (2014) \$8.75 per hour (2015) \$9.00 per hour (2016)
	<u>Overtime Rate:</u>	\$17.31 / hour (11.54 x 1.5) – See NYLL/FLSA

Unpaid Minimum Wages: **NO UNPAID MINIMUM WAGES**

Unpaid Overtime: **\$19,993.05** (\$17.31 x 35 hours x 33 weeks)

TOTAL UNPAID WAGES (MW + OT): **\$19,993.05**

LIQUIDATED DAMAGES: **\$19,993.05**

PENALTY – NYLL §195(1): **\$5,000.00**

PENALTY – NYLL §195(3): **\$5,000.00**

COSTS: **\$815.00**

LEGAL FEES: **TBD**

INTEREST (9%): **TBD**

TOTAL DEMAND: **\$50,801.10**

(Excluding Legal Fees and Interest)